

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re: Geraldine Bernadin,	:
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Debtor,	:
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In re: Geraldine Bernadin,	:
	:
Debtor,	:
	:
v.	:
	:
U.S. Bank National Association as Trustee, Successor in Interest Wachovia Bank National Association, as Trustee for Merrill Lynch Investors Trust, Mortgage Loan Asset Backed Certificates, Series 2005-A6, <i>et al</i> ,	:
	:
Defendants.	:
	:
-----X	

CHAPTER 13

BANKRUPTCY NO. 18-12717
(ELF)

Adv. # 18-00281 (ELF)

RULE 26(F) JOINT PROPOSED DISCOVERY PLAN

Debtor, Geraldine Bernadin (“Debtor”), and Defendants, U.S. Bank National Association, as Trustee, Successor in Interest to Wachovia Bank National Association as Trustee for Merrill Lynch Investors Trust, Mortgage Loan Asset Backed Certificates, Series 2005-A6 and Ocwen Loan Servicing, LLC (“Defendants”), respectfully submit the following Rule 26(f) Joint Proposed Discovery Plan in accordance with this Court’s Pre-Trial Order dated December 20, 2019 (the “Pre-Trial Order”).

Debtor and Defendants (collectively “Parties”) respectfully report that they believe they have adequately covered the required topics under Federal Rule of Civil Procedure 26(f)(3) and, having agreed on the matters set out below, request that the Court enter an order approving the following Rule 26(f) Joint Proposed Discovery Plan.

1. The Parties respectfully report that they conferred on January 27, 2020 to review the Pre-Trial Order and to agree on a discovery plan.

2. The Parties do not request that any changes be made in the form or requirement for disclosures under Rule 26(a).

3. The Parties do not anticipate calling any expert witnesses.

4. The Parties jointly and respectfully request that each of the deadlines set forth in the Pre-Trial Order be adjourned by sixty (60) days. This adjournment will permit the Parties to explore all available settlement options.

5. In all other respects, this Joint Rule 26(f) Report, the Federal Rules of Civil Procedure, the Local Civil Rules, and any subsequent Orders of this Court shall govern discovery in this case.

6. The Parties have conferred regarding the disclosure and discovery of electronically stored information, including the form or forms in which it should be produced. At this time, the Parties do not anticipate that electronic discovery in this case will be intensive and agree that producing electronically-stored information in hard-copy format or via PDF is appropriate. The Parties also do not anticipate any issues relating to the preservation of electronic information.

7. The Parties respectfully request that the Court adopt this Rule 26(f) Joint Proposed Discovery Plan.

Respectfully submitted,

/s/ Thomas P. Cialino
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Dated: February 3, 2020